

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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| IN RE: Edward F. Behr Diane J. Behr <i>Debtors</i> | CHAPTER 13 NO. 17-23718 TPA |
| Edward F. Behr Diane J. Behr <i>Movants</i> | Related to Doc. No. 88 |
| vs. | |
| CMG Mortgage <i>Respondent</i> | Hearing: February 3, 2021 at 11:30 A.M. |

**CMG MORTGAGE'S RESPONSE TO DEBTOR'S MOTION TO ENFORCE THE AUTOMATIC STAY
TOGETHER WITH A REQUEST FOR A FINDING OF CONTEMPT, THE PAYMENT OF ATTORNEY'S
FEES AND SANCTIONS AND A REQUEST FOR AN EMERGENCY HEARING**

1. Admitted.
2. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Respondent specifically denies the same.
3. Admitted.
4. Admitted.
5. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
6. Admitted.
7. Admitted.
8. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Respondent specifically denies the same.
9. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.

10. Admitted.
11. Admitted.
12. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
13. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
14. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
15. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Respondent specifically denies the same.
16. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Respondent specifically denies the same.
17. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
18. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Respondent specifically denies the same.
19. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required. To the extent that a response may be deemed necessary, the Respondent specifically denies the same.
20. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
21. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
22. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
23. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.

24. The averments in this paragraph refer to a document or documents which speak for themselves and to which no response is required.
25. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
26. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
27. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
28. Denied as a conclusion of law to which no response is required. To the extent that any of the within averments are deemed factual in nature, the same are denied.
29. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
30. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
31. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
32. Denied as a conclusion of law to which no response is required. To the extent that any of the within averments are deemed factual in nature, the same are denied.
33. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
34. Respondent is without sufficient knowledge, information or belief to form an opinion to the truth or falsity of the averments of paragraph and, as such, the same are denied.
35. Denied.
36. Denied.
37. Denied.

Wherefore, Respondent, CMG Mortgage, requests judgment:

- a. Denying Debtor's Request for a Finding of Contempt and the Payment of Attorney's Fees and Sanctions;

- b. Costs of suit and attorney's fees; and/or
- c. Any other relief the Court Deems Just and Proper.

Dated: February 1, 2021

/s/ Brian C. Nicholas, Esquire

Brian C. Nicholas, Esquire (Atty ID 317240)

Attorney for Respondent

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